



September 10, 2015

TO: California Building Standards Commission / DSA – AC

RE: Accessibility Code Change Proposal – August 14, 2015

FROM: Detectable Warning Systems Inc.

Below please find comments regarding the above change proposals;

Section 11B – 705.1.1.1 Dome Size

As a 20+ year manufacturer of detectable warnings I would like to comment regarding the proposed change of the dome size from a height of .18 inch - .22 inch to a fixed height of .20 inch. I would recommend that this change not be instituted for the following reasons;

1. With a fixed height requirement once the domes have received even minimal foot traffic and wear of even the slightest amount (Height) then the panel is effectively out of code. This could be a very costly situation from a potential litigious situation to a very costly panel replacement program to stay exactly within code.
2. From a user perspective the difference of + or - .02 inches is so negligible that it would be completely unnoticeable for the visually impaired pedestrian. It is even too small of a difference to measure without sophisticated measuring equipment.
3. From a manufacturing perspective this lack of any tolerances is could be extremely difficult to meet, depending on the material type and process used to manufacture.
4. For manufacturers that may have existing tooling that falls within the current variances, but perhaps isn't exactly .2 inch the cost to retool could be in excess of \$100,000 if new tooling is required. This cost would ultimately be passed through contractors to the state and California tax payers or if companies chose not to retool then the number of qualified manufacturers could be greatly reduced and impact the competitive aspect of providing good pricing for state jobs.

Should the committee have any questions please feel free to contact me.

Sincerely,

Michael Keels
President

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